

JULY 22, 2008

MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURTUNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

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MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURTScott Hildreth# 2007-0028801(Enter above the full name
of the plaintiff or plaintiffs in
this action)08CV3506
JUDGE CASTILLO
MAGISTRATE JUDGE BROWN

vs.

(To be supplied by the Clerk of this Court)

COOK COUNTYCOOK COUNTYSalvador Godinez Director COOC
SALAZARFormer Supt Dir. P. SalazarSupt. Dir. P. Thomas THOMASCRW Mr. Butler. BUTLERSalvador GodinezFormer Supt SALAZARDir. P. Supt THOMASCRW BUTLERSgt. NeppaLaw Enforcement 1 2 7(Enter above the full name of ALL
defendants in this action. Do not
use "et al.")

CHECK ONE ONLY:

XCOMPLAINT UNDER THE CIVIL RIGHTS ACT, TITLE 42 SECTION 1983
U.S. Code (state, county, or municipal defendants)COMPLAINT UNDER THE CONSTITUTION ("BIVENS" ACTION), TITLE
28 SECTION 1331 U.S. Code (federal defendants)

OTHER (cite statute, if known)

BEFORE FILLING OUT THIS COMPLAINT, PLEASE REFER TO "INSTRUCTIONS FOR
FILING." FOLLOW THESE INSTRUCTIONS CAREFULLY.

I. Plaintiff(s):

- A. Name: SCOTT Wilder
- B. List all aliases: N/A
- C. Prisoner identification number: 2097-0028801
- D. Place of present confinement: COOK COUNTY Jail DW 9
- E. Address: 2650 E. Calhoun Ave Chicago, IL 60648

(If there is more than one plaintiff, then each plaintiff must list his or her name, aliases, I.D. number, place of confinement, and current address according to the above format on a separate sheet of paper.)

II. Defendant(s):

(In A below, place the full name of the first defendant in the first blank, his or her official position in the second blank, and his or her place of employment in the third blank. Space for two additional defendants is provided in B and C.)

- A. Defendant: Salvador Godinez
 Title: Director Cook Co Dept Corr
 Place of Employment: COOK CO.
- B. Defendant: J Salazar
 Title: Former Supt DW 9 CCLP
 Place of Employment: COOK CO.
- C. Defendant: Supt DW 9 Thomas
 Title: Supt DW 9
 Place of Employment: COOK CO.

(If you have more than three defendants, then all additional defendants must be listed according to the above format on a separate sheet of paper.)

III. List ALL lawsuits you (and your co-plaintiffs, if any) have filed in any state or federal court in the United States:

- A. Name of case and docket number: 07C 4696 / 08C 1461
- B. Approximate date of filing lawsuit: Aug 20 07 / Feb 15 08
- C. List all plaintiffs (if you had co-plaintiffs), including any aliases: Scot Kuntz
- D. List all defendants: Conkco Pump & Equip. CCSP.
Christopher McCabe
- E. Court in which the lawsuit was filed (if federal court, name the district; if state court, name the county): SAME
- F. Name of judge to whom case was assigned: Kennedy / Carrillo
- G. Basic claim made: Wife and children / Personal & medical
- H. Disposition of this case (for example: Was the case dismissed? Was it appealed? Is it still pending?): partly both
- I. Approximate date of disposition: ?

IF YOU HAVE FILED MORE THAN ONE LAWSUIT, THEN YOU MUST DESCRIBE THE ADDITIONAL LAWSUITS ON ANOTHER PIECE OF PAPER, USING THIS SAME FORMAT. REGARDLESS OF HOW MANY CASES YOU HAVE PREVIOUSLY FILED, YOU WILL NOT BE EXCUSED FROM FILLING OUT THIS SECTION COMPLETELY, AND FAILURE TO DO SO MAY RESULT IN DISMISSAL OF YOUR CASE. CO-PLAINTIFFS MUST ALSO LIST ALL CASES THEY HAVE FILED.

IV. Statement of Claim:

State here as briefly as possible the facts of your case. Describe how each defendant is involved, including names, dates, and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. (Use as much space as you need. Attach extra sheets if necessary.)

ADA.

From Jan 08 to Dec 08 I have been
denied any rights or a notice of ADA

American with Disabilities Act 42 USC 12101 et seq.

I filed a writ of habeas in Jan 08 he did
nothing no response answer or after that
asked for several times? to be heard
now Supr Prisoner Jones says

I want to work with the courts, I want
to be heard, I

need help.

ACCESS TO COURTS

Being denied access to courts for months. Prisoner's Rights to

court cases, just staff have security and taking the time to

meet with the Prisoner the taking is it is up to the Prisoner who

wants to be a defendant Rights of a Prisoner's access to a court

just has ^{been} security, the Prisoner, and the court and the Prisoner's case

proceeding and

A.D.A.

I am writing this for Scott Cause of his Disability.
 Claim: From Jan^{8th} 2008 to date MAY^{31st} 2008 I have
 been denied any Relief of a Nature of A.D.A
 Americans with disabilities act. 42 USC 12101 et seq.
 I filed it with Superintendant div. 9, Mr Salazar
 approx. Jan^{8th} 2008 he did Nothing, No Response,
 threw it out. CRLW butler asked he about
 it several times, to no avail.

Now, New Supt. Div 9 Thomas is doing the
 Same thing "Nothing"

~~ACCESS TO COURTS~~

~~I am being denied also my right of ACCESS TO COURTS FOR MONTHS
 & filed numerous grievances. COPIES of JAIL STAFF BOOK SECURITY and
 library. Personnel think they can provide what they want
 when they want to. That discrimination constitutional rights are not
 Federal act on this & have suffered in court cases delayed
 and humiliated me before both my disability and personal
 life ACCESS TO COURTS has been with deliberate indifference
 The Supt Div 9 Mr Thomas makes no effort to
 medical issue 17~~

I'd like an INJUNCTION to relieve either #3 or 4
 in my Proposal of expense or cost ~~of~~ C.D. and
 compensatory damages ~~of~~ \$5,000 - and
 punitive \$3,000
 Run costs of Demand or ACCESS to court
 \$2,500 - 25,000 - emergency drug
 and 10,000 - future drug.

Relief:

Due to the CCDC complete indifference
 to my condition and Ref. let., and refusal to
 admit or even try to cure saying out
 Run February 08 to June approx. 2nd
 ask for the Ref. in Relief.

That CCDC provide me at their expense
 a laptop with Book/Word Processor
 compatible to download with Printer system
 in Dist. 9 line 1000.

and \$5,000 each month or net
 covering all capital and personal
 ordered by Court immediately
 run 1/08

V. Relief:

State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.

I'd like an ^{injunction} ~~injunction~~ for #4 in my
 Proposed and a compensatory damages of \$50,000
 punitive damages of \$25,000
 I'd like an injunction for number 3 or 4 in my
 PROPOSAL compensatory damage \$50,000 punitive damage \$25,000
 Address: 1234 Main St, Anytown, USA 12345
 Phone: 123-456-7890

VI. The plaintiff demands that the case be tried by a jury. ☐ YES ☒ NO

CERTIFICATION

By signing this Complaint, I certify that the facts stated in this Complaint are true to the best of my knowledge, information and belief. I understand that if this certification is not correct, I may be subject to sanctions by the Court.

Signed this 6 day of June, 2008

Scott Hildreth

(Signature of plaintiff or plaintiffs)

SCOTT HILDRETH

(Print name)

2007-0020801

(I.D. Number)

Box 089002

Croft, IL 60608

(Address)

Feb. 08

DISABLED PRISONERS. Prisoners with disabilities or handicaps are protected both by the Constitution and by federal statutes. Under the Constitution, prison officials must meet the medical needs of disabled prisoners and furnish the assistance that they require in order to live a minimally decent life in prison. As one court put it, "the prison authorities must take the prisoner as they find him and provide facilities compatible with his physical condition that meet civilized standards of decency."

RUIZ V. ESTELLE 503 F.Supp 1265

Disabled prisoners have greater rights under the Americans with Disabilities Act of 1990 (ADA).

42 U.S.C. § 12101 et seq.

ADA applies to any public entity. A "public entity" is defined in the ADA as including "any State or local government" or "any department, agency, special purpose district, or other instrumentality of a State or States or local government. This definition clearly includes correction departments and other agencies that operate prisons and jails.

COUGHLIN 145 F.R.D. 339

To take advantage of the ADA, you must be a "qualified individual with a disability." "Disability" under the ADA means:

- (A) a physical or mental impairment that substantially limits one or more of the major life activities of [an] individual;
- (B) a record of such impairment; or
- (C) being regarded as having such an impairment.

A "qualified individual with a disability" is one who

with or without reasonable modification to rules, policies, or practices, the ~~removal~~ of architectural, communication, or transportation barriers, or the provision of auxiliary aids and services, meets the essential eligibility requirements for the receipt of services or the participation in programs or activities...

The rights ~~the~~ the ADA provides to prisoners are broader than those guaranteed by the Constitution in several respects.

First, the statute requires defendants to change the way they operate, to provide additional services, and to make physical renovations if necessary to avoid excluding disabled persons from programs and services. The Rehabilitation Act standard, which will almost certainly be applied under the ADA, calls for "reasonable accommodations" to permit handicapped persons to participate in prison programs.

Accommodations are only deemed unreasonable if they impose "undue financial and administrative burdens" or require "a fundamental alteration in the nature of [the] program." This is a much more favorable standard than the "reasonable relationship" test of *Turner v. Safley*, under which prison officials are entitled to avoid "ripple effects" on fellow inmates or on prison staff, and prisoners must propose alternatives with "de minimis cost" in order to win.

Second, prisons may not engage in blanket exclusions of whole classes of prisoners from certain activities. They must make individualized judgments as to what individuals are "qualified."

Third, prisons may not give in to the perceptions or fears of inmates and staff. As noted above, the ADA specifically protects those who are "regarded" by others as having a disability, as well as those who actually have one.

The ADA requires the federal government to promulgate regulations implementing the statute. These regulations spell out in more detail what public entities must do to comply with the statute. These obligations include conducting self-evaluations of their compliance and adopting a procedure for handling complaints.

You are not required to exhaust administrative remedies before suing under the "public entity" provisions of Title II of the Americans with Disabilities Act. The relief available includes equitable relief (an injunction) and back pay; we believe that damages are available also.

LETTER OF INFORMATION ON PROPOSAL

ACCORDING to (42 USC § 12101 et seq) "Americans with Disabilities Act" (4 pages info attached) I am entitled to assistance, for my problem writing due to Parkinson's Disease. It impairs my ability to communicate with my attorney, family, court, and C.C-J-CRW, mail room, C/O's, grievances, clothing, administration, anything, etc...

I am entitled to a reasonable solution.

I propose the following:

- 1) I be allowed to use typewriter in Law Library at least 3 times a week, for 2 to 3 hours each time;
OR
- 2) A typewriter be brought up to 9-3H^E (or store room on 3H) for my use 6 to 9 hours per week;
OR
- 3) I am provided with a laptop word processor, and able to download once a week, and print;
OR
- 4) I be allowed to receive direct from a vendor a Canon portable typewriter AC/DC, very small approximately 10 1/2" x 12" x 1 1/4". This kind of typewriter used to be sold on commissary on IDOC.

Regarding proposal #4 on previous page, I require the following :

- a) A permit allowing me to possess and use and retain said Canon Typewriter, so it will not be confiscated by staff in a shake-down and/or as contraband.
- b) Two sets of batteries for said Typewriter.— extra set to be held as deemed appropos (?)
- c) Two extra ribbon cartridges for Typewriter.

Thank you for your consideration

Sincerely 3-1308
Buck

Reply
Required

mc GUNE

LINK CARD ?

C ~~TRK~~ Sent out ? AT RICS or in TRK ?

Need Transcript in Desk Bottom Drawer

Papers in front case in garage Bench or 1st fl Papers
written + typed.

Glasses ?

Stacy

STUFF REEP

CAR AND SPARKS + Kenwood case TCD Lyrer

have stored in shed. CDs in Room Bledick

+ link only in garage at case. in TRK + hand box ?

SELL

BILLER 6000

~~Angie~~

comp

INS 100- ?

5901 THNES 600 75-

★

COURT ORDER

Law Library 3X5 wk minimum

PSYC. evaluation Elgin JUDGE ?

glasses

meds.

ADDERAL

★

PUB DRK. cost ahead with APP DRK. 94

need PL. Dredd looking 630 221 3400

Papers in wood front case in garage at Dredd
Transcript + Papers in Buller's 2 Drawing.

What kind of

1. *Style*
 2. *Design*
 3. *Material*
 4. *Color*
 5. *Texture*
 6. *Shape*
 7. *Size*
 8. *Weight*
 9. *Volume*
 10. *Form*
 11. *Space*
 12. *Time*
 13. *Value*
 14. *Quality*
 15. *Quantity*
 16. *Intensity*
 17. *Duration*
 18. *Frequency*
 19. *Amplitude*
 20. *Phase*
 21. *Wavelength*
 22. *Frequency*
 23. *Amplitude*
 24. *Phase*
 25. *Wavelength*
 26. *Frequency*
 27. *Amplitude*
 28. *Phase*
 29. *Wavelength*
 30. *Frequency*
 31. *Amplitude*
 32. *Phase*
 33. *Wavelength*
 34. *Frequency*
 35. *Amplitude*
 36. *Phase*
 37. *Wavelength*
 38. *Frequency*
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 42. *Frequency*
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 85. *Wavelength*
 86. *Frequency*
 87. *Amplitude*
 88. *Phase*
 89. *Wavelength*
 90. *Frequency*
 91. *Amplitude*
 92. *Phase*
 93. *Wavelength*
 94. *Frequency*
 95. *Amplitude*
 96. *Phase*
 97. *Wavelength*
 98. *Frequency*
 99. *Amplitude*
 100. *Phase*

~~CHANGE VENUE spent about 7~~

~~LAW FIRM HING PROHIBIT MROH CASE?~~
~~CONFIDENTIAL~~

~~Quash Strathmore~~

(2-123) ALIBET Human serv Skokke Township. 1922 comp 14
very fine PRK Bridge Pits on octan mine near. Road DL

RIGOR IN CONDUCT AND ACCUSATIONS? ^{as Rep. B. V. C.}
line up for blame ^{as Rep. D. W. C.}

Plasma in custody was 1711 10pm until then CCS
 Howard & beam suspect? 5p who who? came with video
 American laptop from late 60? who place the letter
 Applying for needed when 1200-500 men appeared, 7
 Special Snows? Return with computers on
 with no movement 7

when did you know she called? ~~She~~ But he.
 How is it for you? I am sure that you are
 again and I and I have the same feeling,
 when you find that she is in it?

Did he threaten you verbally? Threaten to hurt you?
 Is it your testimony the man correlated in your
 MASH book? That is, when young white man -
 crew were out. Had you ~~to~~ Mr. Scott? Color eyes
 when apprehended you had he more than sitting aside
 switched up of calm and ~~you~~ ~~and~~ ~~there~~ ~~was~~ ~~not~~
 what was to me like man Braddock class (black
 but) to know as well as there

was it by force or [unclear] manuscript
Did the person say things like you have been
so the writing was done here or
he could not know you or the writing
Did you refuse to go no, not alone, or Robert F. Kennedy
to go?

(Handwritten note circled in red ink)

3

When RESTORED

20070028801

P. 9 2F

would be on number 3 on page 7

Did he know the identity of party? 6/1/48

Did he know the identity of party? 6/1/48

* He was born 9356

Did he know the identity of party? 6/1/48

He was born 9356

* Did he know the identity of party? 6/1/48

Did he know the identity of party? 6/1/48

He was born 9356

* Did he know the identity of party? 6/1/48

GLASSES - LAW FIRM High Profile media

Did he Threaten you ^{verbally}
 Did he ~~THREATEN~~ ^{verbally} TO ~~HURT~~ ^{HURT} YOU
 WHERE Did you say screw driver? or Push
 when 1st time you helped you up? and again?
 not hold on you while you lay down when.
 Did he hold it up to you in a threat manner and?
 He did not hold it in ^{hand} except on back corner?
 Did he tell you things like he would not let you
 go to go home, and then ~~and then~~ ^{and then} ~~and then~~ ^{and then}
 he did say you days ago? 7 close a red door?
 Did you say he extracted 1st you? when?

most on when ^{1st} you 2 when ^{part 1} ~~part 1~~ ^{part 1}
 when the wire the you see in ^{part 1} ~~part 1~~ ^{part 1}
^{eyes} color eyes. the did you come ~~part 1~~ ^{part 1} ~~part 1~~ ^{part 1}
 DARYL - Glasses, white clothes (try store)
 Post card. - Transcript VISIT
 Right to continue accusation Park Ridge ^{part 1} ~~part 1~~ ^{part 1}
 NEWS PAPER ^{part 1} ~~part 1~~ ^{part 1} ~~part 1~~ ^{part 1}

Did you ever say NO STOP as you go
 summoned to home
 (I'm not the alarm for a while down here)
 but in the house?

Scott H. Hirsch
vs
McBurren

no. 07C4696

5-19-08

Judge Kennelly,

ATTACHED IS A PROPOSITION FOR AN ADA,
Complaint & quest to CLROC. For some relief
or assistance in my inability to write due
to my Parkinson's disease. I cannot write well
to function daily with instructions / matters
or correspond with family. ~~also (RABBY)~~
or most important ~~the~~ ^{ADVERSE} COSTS
in BOTH civil and most of all criminal.
I need help in them all and proposed
it seems not Peter more than case
or understand
can you function or in function
are of my proposed relief sought
best to

There is no text I include 3 pages

or other examples of my
writing

Sanction or in function

For Relief Sought PS- SB